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FOREIGN-TRADE ZONES BOARD

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September 3, 2009

Mr. Andrew McGilvray  
Executive Secretary  
Foreign-Trade Zones Board  
U.S. Department of Commerce  
1401 Constitution Avenue, N.W., Room 2111  
Washington, DC 20230

**Re: Foreign-Trade Zone 82, Application for Subzone Authority,  
ThyssenKrupp Steel and Stainless USA, LLC**

Dear Mr. McGilvray:

Pursuant to the Department's notice announcing a public hearing in the above-captioned matter, 74 Fed. Reg. 38,401, we write to inform you of the Flat-Rolled Task Force of the Specialty Steel Industry of North America's intent to participate in the hearing on September 10, 2009. The Flat-Rolled Task Force of the Specialty Steel Industry of North America will be represented by Mr. Terrence L. Hartford, who is the Vice President and General Manager - Sheet at ATI Allegheny Ludlum.

Mr. Hartford's testimony will highlight the fact that the sub-zone application filed on behalf of ThyssenKrupp Steel and Stainless USA, LLC is inconsistent with each of the three threshold factors identified in the Foreign-Trade Zone Board's regulations, 15 C.F.R. § 400.31(b)(1)(i)-(iii). Further, his testimony will observe that even if the Board finds that the threshold factors are satisfied, ThyssenKrupp's application is not in the public interest. Under either scenario, ThyssenKrupp's application should be denied by the Board.

Please do not hesitate to contact the undersigned should you have any questions concerning this submission.

Sincerely,



DAVID A. HARTQUIST

LAURENCE J. LASOFF

JOHN M. HERRMANN

Counsel

Flat-Rolled Task Force of the  
Specialty Steel Industry of North America

Mr. Andrew McGilvray  
September 3, 2009  
Page Two

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